

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
) CRIMINAL NO. 15-10271-WGY
v.)
)
)
ALEX LEVIN,)
)
)
Defendant.)

**GOVERNMENT'S PROPOSED METHOD FOR DISPLAY OF CHILD
PORNOGRAPHY**

The United States of America hereby proposes the following procedures relative to the display of evidence constituting child pornography:

1. The government will maintain exhibits containing child pornography on media (i.e., discs) separate from other, non-pornographic exhibits.
2. The government will use a stand-alone computer to publish the images and videos of child pornography to the jury directly from a disc, rather than loading the images and videos into a trial director program.
3. The government will publish still images for no longer than five seconds. The government will play videos for no longer than five seconds.¹ The government will not enable audio for any videos it plays.
4. The government witness through whom the child pornography exhibits will be introduced will describe each image or video before the visual depiction is published to the jury.
5. Any computer or television screens facing the gallery shall either be turned off or moved so that no member of the gallery can view child pornography exhibits as they are displayed.
6. Exhibits containing child pornography will not be loaded into JERS. Child pornography exhibits will be submitted to deliberating jurors on a separate disc with a clean, stand-alone computer that is not network-enabled.

¹ If the government is required to prove sentencing enhancements to the jury (i.e., rather than to the Court as part of a bifurcated proceeding), the government may need to play certain videos for longer than five seconds.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

Dated: May 14, 2019

By: */s/ Anne Paruti*
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CERTIFICATE OF SERVICE

I, Anne Paruti, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: May 14, 2019

/s/ Anne Paruti
Assistant United States Attorney